

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: \$29,670.00 IN UNITED STATES ) M.B.D. No. 22-MC-91561-DJC  
CURRENCY SEIZED ON MAY 17, 2022, )  
\$27,270.00 IN UNITED STATES )  
CURRENCY SEIZED ON MAY 17, 2022, )  
\$40,000.00 IN UNITED STATES )  
CURRENCY SEIZED ON MAY 17, 2022, )  
AND \$9,000 IN UNITED STATES )  
CURRENCY SEIZED ON MAY 17, 2022 )

**ASSENTED-TO MOTION TO EXTEND DEADLINE**  
**FOR THE UNITED STATES TO FILE CIVIL FORFEITURE COMPLAINT**

The United States of America, by its attorney, Rachael S. Rollins, United States Attorney for the District of Massachusetts, with the assent of those persons to identify themselves as Claimants to date, pursuant to 18 U.S.C. § 983(a)(3)(A), respectfully requests an extension of time to file a civil complaint against the following seized property:

- a. \$29,670.00 in United States currency, seized on May 17, 2022, currently being held in the District of Massachusetts;
- b. \$27,270.00 in United States currency, seized on May 17, 2022, currently being held in the District of Massachusetts;
- c. \$40,000.00 in United States currency, seized on May 17, 2022, currently being held in the District of Massachusetts; and
- d. \$9,000.00 in United States currency, seized on May 17, 2022, currently being held in the District of Massachusetts (collectively, the “Currency”).

A proposed order is attached to this motion.

The Drug Enforcement Administration (“DEA”) seized the Currency and commenced administrative forfeiture proceedings. On or about August 18, 2022, the DEA received five, separate claims for different portions of the Currency from Melvin Gonzalez, Welfrey Cabral, Robert Castillo, Maximo Santos-Ortiz, and Remi Baez-Ruiz through their attorney Christopher L. Malcolm. No other claims were submitted. Between September 7, 2022, and September 28, 2022, the United States received copies of these claims from the DEA. On November 3, 2022, prior to the United States’ 90-day deadline of November 16, 2022 to file a civil complaint against the Currency as required by 18 U.S.C. § 983(a)(3), the United States filed an Assented-to Motion to

Extend Deadline for the United States to File Civil Forfeiture Complaint to January 15, 2023. The court granted the United States' motion on November 16, 2022.

Pursuant to 18 U.S.C. § 983(a)(3)(A), the Court may extend the time to file a civil forfeiture action upon agreement of the parties. The undersigned Assistant United States Attorney requires additional time to review the seizure and claims of the Claimants and conferred with counsel for the claimants regarding this extension. The Claimants' counsel assents to the requested extension.

WHEREFORE, the United States respectfully requests that the Court grant its request and extend the deadline to file a civil forfeiture complaint for an additional 60 days, or up to and until March 16, 2023.

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney

By: /s/ Raquelle L. Kaye  
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Dated: January 6, 2023

**CERTIFICATE OF SERVICE**

I, Raquelle L. Kaye, Assistant United States Attorney, certify that the foregoing motion filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and via electronic mail to attorney Christopher L. Malcolm.

/s/ Raquelle L. Kaye  
RAQUELLE L. KAYE  
Assistant United States Attorney

Dated: January 6, 2023